



389 Princeton Avenue, Santa Barbara, CA 93111

*Chair*  
Jim Childress

November 16, 2007

*Vice-Chair*  
Fran Farina

Eric Gillies, Project Manager  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

*Secretary*  
Ed Easton

*Treasurer*  
Virginia Turner

**RE: PRC 421 RECOMMISSIONING PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS**

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*At Large*  
Robert Bernstein

Dear Mr. Gillies:

*At Large*  
Tony Biegen

The Santa Barbara Group of the Sierra Club Los Padres Chapter submits these comments on PRC 421's Draft Environmental Impact Report (DEIR) [CSLC EIR No. 732].

*At Large*  
Stephen Dougherty

Venoco, Inc. (Venoco) is the Project applicant. We appreciate the extension of time granted from November 2 to today; unfortunately the State Lands Commission did not hear Venoco's related Ellwood Marine Terminal lease on October 30, 2007 which leaves many unresolved issues in this DEIR.

*At Large*  
Lynn Kirst

Venoco has two well sites on two piers east of its onshore facility located between the Bacara resort hotel and Sandpiper Golf Course. This is the only remaining oil processing facility in California's surf zone. Production ceased in 1994, but Venoco now wants to return the lease to full oil production. Emergency repairs have twice been required, once for a leak, the other to stabilize both wells and repair the access road and piers. Oil from 421 was processed on the pier, piped to Line 96 and the EMT, and ultimately barged to San Francisco or Los Angeles. The proposal now is to process the oil at Venoco's onshore facility and then to Line 96, the EMT, and increase its barge traffic.

The DEIR is deficient in that it fails to recognize this proposal expands the existing operation at Venoco's non-conforming Ellwood Onshore Facility (EOF) which would require rezoning.

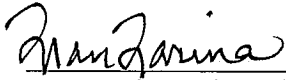
All of the DEIR assumptions related to PRC 421 oil transportation are inter-related with the EMT lease resolution. As stated previously, Lease 421 requires use of the EMT and barging. Therefore we request that this EIR not be finalized until there is a determination on the EMT. This directly affects the transportation alternative selected and the timeline for implementation. There may even be a need to wait for the pipeline alternatives currently

under review in the DEIR for Venoco's Offshore Oil and Gas Development and Onshore Pipeline Project (Full Field Development). They provide a more detailed analysis than what this document includes.

Given the recent oil spill in San Francisco Bay, elimination of barging is critical. Every trip of the barge Jovalan can transport a similar quantity of oil.

In addition to these comments, we support the more detailed comments submitted by Get Oil Out!

Respectfully submitted,



Fran Farina, Vice Chair

Sierra Club, Los Padres Chapter, Santa Barbara Group

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